

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: 1:15-CV-01046
)	
Plaintiff,)	
)	JUDGE SOLOMON OLIVER, JR.
vs.)	
)	<u>NOTICE SUBMITTING THE 2025</u>
CITY OF CLEVELAND)	<u>MONITORING PLAN</u>
)	
Defendant.)	
)	
)	

Pursuant to Paragraph 369 (a)(b)(c) of the Consent Decree between the City of Cleveland ("City") and the United States ("DOJ"), the Monitoring Team submits the 2025 Monitoring Plan, attached hereto as Exhibit A ("2025 Monitoring Plan," "2025 Plan," or "Plan").

I. 2025 MONITORING PLAN PURPOSE

The 2025 Monitoring Plan is intended to provide the Court and the public visibility into the work the Parties will undertake in 2025, in an effort to comply with certain requirements set forth in the Consent Decree.

This Plan covers the period of January 1, 2025 through December 31, 2025 with a limited number of deadlines occurring in 2026. This Plan is meant to define responsibilities ensuring each Party is held accountable for their contributions toward implementing the Consent Decree. It is a structure for shared goals to help track progress throughout the year.

II. 2025 MONITORING PLAN CREATION

The Monitoring Team worked with the Parties to align on tasks and timelines set forth in the Monitoring Plan. After developing an initial draft of the Monitoring Plan, the Monitoring Team sought input from the City and DOJ. It further met with the Parties in-person and onsite in Cleveland over

the course of two (2) days to further solidify the Monitoring Plan deliverables. Consistent with last year, input was received, considered, and, where appropriate, incorporated from the City and DOJ.

III. 2025 AND 2026 PLANNED ACHEIVEMENTS

This year's activities continue to reflect a focus on conducting compliance assessments, which require cooperation from both Parties. Formal compliance assessments are an important mechanism by which the Monitoring Team can assess the City's compliance with the Consent Decree utilizing data and evidence to support its conclusions. In 2025, the Monitoring Team will be working on nine (9) compliance assessments. At least four (4) of those assessments are projected to be completed in 2025, while the remaining assessments are projected to be completed sometime in 2026. Following a formal assessment, the Monitoring Team will be able to determine whether the City has reached full compliance in the relevant areas and provide specific direction in areas that have not reached full compliance. This rigorous and aggressive assessment strategy is designed to help everyone—the Court, the Parties, and the Community—understand exactly what has occurred over the lifespan of this Consent Decree.

IV. CONCLUSON

The Monitoring Team respectfully requests that the Court approve the 2025 Monitoring Plan and order it effective immediately.

Respectfully submitted,

/s/ Karl Racine

KARL A. RACINE
Independent Monitor
Partner, Hogan Lovells US LLP
Columbia Square
555 Thirteenth Stret, NW
Washington, DC 20004
Email: karl.racine@hoganlovells.com

CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2025, I served the foregoing document entitled Notice Submitting the 2025 Monitoring Plan via the court's ECF system to all counsel of record.

/s/ Karl Racine
KARL A. RACINE